

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
HEBEI MIGHTY SYNTHETIC RUBBER AND
PLASTIC CO. LTD.,

Case No. 21-cv-10674 (PAE)

**MOTION FOR
DEFAULT JUDGMENT**

Petitioner,

-against-

GLOBAL SYN-TURF, INC.,

Respondent.
-----X

Petitioner, Hebei Mighty Synthetic Rubber and Plastic Co. Ltd., hereby moves the Court pursuant to Federal Rule of Civil Procedure 55 (b) and Local Civil Rule 55.2 to enter default judgment in the amount of \$471,213.46, with interest in accordance with the final arbitration award issued on May 17, 2021 by the International Center for Dispute Resolution, in favor of Petitioner and against Respondent Global Syn-Turf, Inc. on the grounds that said Respondent failed to answer or otherwise defend against this action.

Dated: August 8, 2022

MAZZOLA LINDSTROM LLP

s/Ruofei Xiang

Ruofei Xiang

1350 Avenue of the Americas,
2nd Floor

New York, New York 10019

Tel: (646) 216-8300

ruofei@mazzolalindstrom.com

Attorneys for Petitioner

To: Global Syn-Turf, Inc.
5960 Inglewood Drive, Suite 150
Pleasanton, CA 94588